

December 4, 2001

Magalie Roman Salas
Office of the Secretary
Federal Communications Commission
445 12th Street, S. W.
Washington, DC 20554

Re: Ex Parte Concerning: Common Carrier Bureau Seeks Comments On the
Petitions of Representative Keith R. McCall and Other Pennsylvania State
Representatives and the Louisiana Public Service Commission Requesting
Delegated Authority to Implement Number Conservation Measures
NSD File Nos. L-01-113 & L-01-147
CC Docket Nos. 96-98 & 99-200

Ex Parte Concerning: The Common Carrier Bureau Seeks Comment on
the National Thousands-Block Number Pooling Rollout Schedule
DA 01-2419; CC Docket No. 99-200

Dear Ms. Salas:

Philip McClelland, Senior Assistant Consumer Advocate and NASUCA
delegate to NANC sent to Diane Harmon, Network Services Division, the enclosed letter
and attachment concerning the Thousands Block Pooling Trial for the 717 and 570 area
codes. These materials emphasize the importance of facilitating the creation of pooling
in those NPAs and a transition to the national program.

Please note that this Ex Parte letter has been filed electronically. Please indicate your receipt of this filing on the additional copy provided and return it to the undersigned in the enclosed self-addressed, postage prepaid, envelope. Thank you.

Sincerely yours,

Philip F. McClelland
Senior Assistant Consumer Advocate

Enclosure

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Diane Harmon,
Designated Federal Officer
Federal Communications Commission
445 12 St., S.W.
Room 5C441
Washington, D.C. 20554

Re: Ex Parte Concerning: Common Carrier Bureau Seeks Comments On the
Petitions of Representative Keith R. McCall and Other Pennsylvania State
Representatives and the Louisiana Public Service Commission Requesting
Delegated Authority to Implement Number Conservation Measures
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Dear Ms. Harmon:

As a follow up to our conversation last week about the above-referenced proceedings, I am forwarding for your review the signature pages to the Joint Petition approved by the Pennsylvania Public Utility Commission on August 9, 2001 which established thousands-block number pooling in the 717 and 570 area codes. Please note the following signors all operate in the 717 and 570 area codes and have all agreed to participate in pooling. These companies include:

Arbros Communications
Sprint/United Telephone Company
D&E Communications

Verizon Pennsylvania/Verizon North
XO Pennsylvania, Inc.
Choice One Communications
CTSI, LLC
Adelphia Business Solutions
ATX/Corecomm
Cavalier Company
US LEC of Pennsylvania

Additionally, the following companies have included written correspondence indicating their support for thousands-block number pooling in the 717 and 570 area codes:

KMC Telecom
AT&T

Please note, that you already have a copy of the PA PUC's August 9, 2001 Order which approved this Joint Petition. We are unaware of any telephone companies operating in the 717 and 570 area codes that have expressed their opposition to these pools.

As such, the PA OCA submits that it is appropriate to roll the 717 and 570 pools into the national system when the national schedule begins on March 15, 2002. Neustar has advised the PA PUC that they stand ready and able to implement any pool directed by the PA PUC but they cannot rollout any state pool after commencement of the national pooling roll out.¹ The 570 pool will start on February 28, 2002 and the 717 pool will start on March 14, 2002. Therefore, these pools should be rolled into the national schedule on March 15, 2002.

As further support that these pools should be rolled into the national schedule on March 15, 2002, the PA OCA submits that, in the Pennsylvania Order², the FCC allowed thousands-block number pooling provided that carrier participation is voluntary and that the pool complies with national pooling standards. Furthermore, the FCC has indicated that any pooling underway prior to the implementation of the national schedule will be transitioned into the national schedule so long as such pooling starts prior to when the national schedule commences and conforms with the national standards.³ The PA PUC Order requires that the 570 and 717 pools be in compliance

¹ Order, Implementation of Accelerated Voluntary Thousands-block Pooling in the 570 and 717 Area Codes, Docket No. M-00001427 (August 9, 2001) at 6 ("PA PUC Order").

² In the Matter of Petition for Declaratory Ruling and Request for Expedited Action on the July 15, 1997 Order of the Pennsylvania Public Utility Commission Regarding Area Codes 412, 610, 215 and 717, 13 FCC Rcd 19,009 (rel. September 28, 1998) at ¶27.

³ See, Report and Order and Further Notice of Proposed Rulemaking, CC Docket

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with national pooling standards.⁴

The PA OCA submits that the PA PUC has the authority to issue pools such as they have done in their August 9th Order and such pools should be rolled into the national schedule on March 15, 2002 so that their progress will be continued uninterrupted from their prior start dates. The PA OCA does not believe it necessary that the proposed national roll out schedule need be revised to accommodate the inclusion of the 717 and 570 pools into the national schedule.

Therefore, and in light of the voluntary agreement to pool from the above named telephone companies that operate in the 570 and 717 area codes, the PA OCA submits that the 717 and 570 pools be rolled into the national system when the national schedule begins on March 15, 2002.

Very truly yours,

Philip F. McClelland
Senior Assistant Consumer Advocate

attachments

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No. 99-200, 15 FCC Rcd 7574 (rel. March 31, 2000) at ¶¶169-171; and Second Report and Order, Order on Reconsideration in CC Docket No. 96-98 and CC Docket No. 99-200, and Second Further Notice of Proposed Rulemaking in CC Docket No. 99-200, 16 FCC Rcd 306 (rel. December 29, 2000) at ¶46. See also, Public Notice, Common Carrier Bureau Seeks Comment on the National Thousands-block Number Pooling Rollout Schedule, CC Docket No. 99-200 (rel. October 17, 2001) at 2.

⁴ PA PUC Order at 7-8.